

### **REMARKS**

The final Office Action of May 4, 2004 has been received and carefully reviewed. By the above actions, claims 58, 59, 68, 70 and 72 have been amended; while claims 25-49 have been canceled. Claims 1-24 and 50-82 are currently pending with claims 1-24 having been withdrawn from consideration as being drawn to a non-elected invention. In view of these actions and the following remarks, further consideration of this application is now requested.

With regard to the Examiner's objection to the drawing of the Office Action of February 10, 2003, it is noted that the Examiner has not indicated in the instant final Office Action that the new formal drawing (Figure 2) submitting June 10, 2003 is acceptable. Since the new formal drawing properly marked Figure 2 as "Prior Art", withdrawal of the Examiner's objection to the drawings is again respectfully requested.

With regard to the prior art rejections of:

Claims 25-28, 30-33, 35-38 and 40-43, under 35 U.S.C. 103(a), as being obvious in view of the teachings of Applicants' Admitted Prior Art (AAPA) combined with the teachings of Yamada ('179), Inoue et al ('206), So et al ('905) and Garcia et al ('369),

Claims 29, 34, 39 and 44, under 35 U.S.C. 103(a), as being obvious in view of the teachings of Applicants' Admitted Prior Art (AAPA) combined with the teachings of Yamada ('179), Inoue et al ('206), So et al ('905), Garcia et al ('369) and further Farber et al ('684),

Claims 45-53, 56-58, 61, 62, 64, 65, 67, 74-80 and 82, under 35 U.S.C. 103(a), as being obvious in view of the teachings of Applicants' Admitted Prior Art (AAPA) combined with the teachings of Yamada ('179), Inoue et al ('206), So et al ('905), Garcia et al ('369), Farber et al ('684), Satoh et al ('334) and Sakata et al ('584), and

Claims 54, 55, 59, 60, 63, 66, 68-73, 79 and 81, under 35 U.S.C. 103(a), as being obvious in view of the teachings of Applicants' Admitted Prior Art (AAPA) combined with the teachings of Yamada ('179), Inoue et al ('206), So et al ('905), Garcia et al ('369), Farber et

al ('684), Satoh et al ('334) and Montgomery et al ('995).

the Applicants again respectfully traverse each of these rejections for the reasons set forth in the Amendment of June 10, 2003, and additionally for the reasons set forth below.

Initially, it is requested that the Examiner specifically outline what portion of the Applicants' Admitted Prior Art (AAPA) is being relied upon as "prior art" in the above rejections since it had been stated, in the Amendment of June 10, 2003, that the problem discussed in the "Description of Related Art" was not prior art and instead was a problem recognized for the first time by the Applicants. The Amendment of June 10<sup>th</sup> notes that the specification, at pages 2-3, sets out a the process of forming a light emitting device by forming an interlayer insulating film 203, forming a wiring line 204 which connects the anode 205 to the TFT 202 through the interlayer insulating film 203 and forming a bank 208 of an organic resin to cover the edges of the anode. Thereafter, an organic compound 206 is formed on the anode 205, and then a cathode 207 is formed on the organic compound 206. (Please note that there is no teaching of forming a resin insulating film over the electrode (anode), the wiring line 204 and the interlayer insulating film 203 followed by forming a resin insulating film which is to become the bank.) By specifically outlining what portion(s) of the specification is/are regarded by the Examiner as "prior art" the issues for appeal for appeal will be clarified and potentially reduced.

With regard to the rejections of claims 25-44, under § 103(a), as being obvious in view of the teachings of Applicants' Admitted Prior Art (AAPA) combined with the teachings of Yamada ('179), Inoue et al ('206), So et al ('905), Garcia et al ('369), and in view of Farber et al ('684), each of these rejections has been rendered moot in view of the cancellation of claims 25-44.

With regard to the rejection of claims 45-53, 56-58, 61, 62, 64, 65, 67, 74-80 and 82, under § 103(a), as being unpatentable over AAPA in combination with

Yamada ('179), Inoue et al ('206), So et al ('905) and Garcia et al ('369) further in view of Farber et al ('684) alone, and in further view Satoh et al ('334) and in view of Sakata et al ('584), although the Examiner contends that the AAPA recognizes the problem of transferring semiconductor wafer from one clean room to another clean room, such the contention is not appropriate since, as noted in the Amendment of June 10, 2003, such a problem had been recognized by the inventors of the subject application for the first time. To address this deficiency, the Examiner contends that Sakata et al. disclose that the half-finished TFT-LCD substrates are exposed to the atmosphere for several hours before being transferred to a clean room for further processing (column 1, lines 47-67). However, although Sakata et al. disclose a problem of unwanted deposition of organic material on the half-finished substrates which are left in the ordinary clean room air for a long time (**and proposes a cleaning apparatus for solving the problem**), the patentees do not disclose transferring the half-finished substrates from one clean room to another clean room after forming a resin insulating film over the electrode, the wiring line and the interlayer insulating film as presently claimed in independent claims 50, 62, 65, 70, 72, 76, 78 and 80. To address this deficiency, the Examiner asserts that Satoh et al. teach forming removable protective films on semiconductor wafers. However, there is no motivation in the AAPA or Sakata et al. to provide the improvement discussed by Satoh et al. to the processing set forth in the AAPA, particularly at the point specified in the instantly claimed invention. Note, Sakata et al. provide a solution to contaminants which involves a particular apparatus and not a processing solution. In view of the above traversal, the Applicants assert that this rejection is not appropriate and should now be withdrawn.

Independent claims 52, 68 and 74 also set forth the step of forming a resin insulating film over the electrode, the wiring line and the interlayer insulating film, and include the further step of forming a film comprising an organic insulating material over the resin insulating for preventing contamination and electrostatic discharge

damage to the substrate. Again, while Satoh et al. teach forming removable protective films on semiconductor wafers, there is no motivation in the AAPA or Sakata et al. to provide the improvement discussed by Satoh et al. to the process of the AAPA at the particularly claimed point in the processing of the current claims 52, 68 and 74. It is emphasized that the solution to the contamination problem of Sakata et al. involves a particular apparatus and not a processing solution.

Regarding the rejection of claims 54, 55, 59, 60, 63, 66, 68, 69-73, 79 and 81, under § 103(a), as being unpatentable over AAPA in combination with Yamada ('179), Inoue et al. ('206), So et al. ('905) and Garcia et al. ('369) further in view of Farber et al. ('684), and further in view of Satoh et al. ('334), and further in view of Montgomery et al ('995), the points of traversal above are equally appropriate to these claims. However, in order to further distinguish the invention from the references cited, the Applicants have proposed the amendments to claims 68, 70, and 72 above for the purpose of providing consistency with the other independent claims, e.g., claim 65, in which the Examiner has considered those added features. Accordingly, the rejection of claims 68-73 is also not appropriate since the combination of references does not disclose a film comprising an organic conductive material, and, further, the prevention of contamination and an electrostatic discharge damage to the substrate (having a thin film transistor formed thereon) is not taught by the proposed combination of references to include:

forming over a resin insulating film after forming the resin insulating film over an anode, a wiring line and an interlayer insulating film (claims 68, 70, and 72);

and moving the substrate, on which the thin film transistor is formed, from a first processing room to a second after forming the film comprising the organic conductive material (claims 70 and 72).

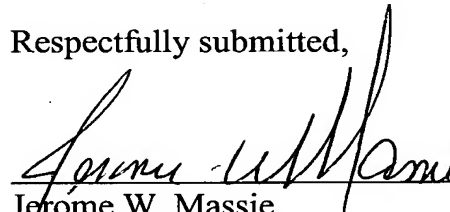
In view of the above traversal, the Applicants assert that this rejection is also not appropriate and should now be withdrawn as well.

While the present application is now believed to be in condition for allowance,

arise, which could be eliminated through discussions with applicant's representative, then the Examiner is invited to contact the undersigned by telephone in order that the further prosecution of this application can thereby be expedited.

Lastly, it is noted that a separate Extension of Time Petition (one month) accompanies this response along with a check in payment of the requisite extension of time fee. However, should that petition become separated from this Amendment, then this Amendment should be construed as containing such a petition. Likewise, any overage or shortage in the required payment should be applied to Deposit Account No. 19-2380 (740756-2435).

Respectfully submitted,



Jerome W. Massie  
Registration No. 48,118

NIXON PEABODY LLP  
401 9<sup>TH</sup> Street N.W.  
Suite 900  
Washington, D.C. 20004-2128  
(202) 585-8000

JLC/JWM